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20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 NATIONAL TPS ALLIANCE, *et. al.*,

Case No. 3:25-cv-05687-TLT

24 Plaintiff,

25 v.
26 **UNOPPOSED REQUEST FOR REMOTE
27 APPEARANCE**

28 KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, *et. al.*,

Judge: Hon. Trina L. Thompson

Defendants.

1 Defendants respectfully request this Court to permit remote appearance of defense counsel at the
 2 hearing on Plaintiffs' Motion for Class Certification, scheduled for September 16, 2025, at 11:00 a.m.
 3 PDT. ECF No. 98. While Defendants will be providing a written response to the Court's questions, and
 4 believe the matter may be resolved on the written filings, counsel for Defendants, Daniel Cappelletti and
 5 William Weiland, have made arrangements to appear in person. However, travel to San Francisco from
 6 Washington, D.C. will entail what adds up to three days out of the office, which complicates their ability
 7 to respond to other deadlines during this timeframe. Additionally, a technology conference in the city
 8 during these same travel dates has pushed lodging costs for hotels near the courthouse well beyond what
 9 is authorized for government travel. As a result, defense counsel have had to make reservations at
 10 lodging that is a substantial distance from the courthouse, further complicating their travel.

11 Plaintiffs' counsel have been consulted and have stated that while they intend to be present in
 12 person, they do not object to Defendants' request for an accommodation to appear remotely. Defense
 13 counsel acknowledge the short-fused nature of this request given their impending travel and appreciate
 14 the Court's indulgence.

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 16 Dated: September 12, 2025

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/s/ Daniel M. Cappelletti
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DEFS.' UNOPPOSED REQUEST FOR REMOTE APPEARANCE
 No. 3:25-cv-5687